



January 22, 2014

Mr. C. Sean Spivey, Asst. Gen. Counsel
Competitive Carriers Association
805 15th Street, NW, Suite 401
Washington, DC 20005

Re: **GN Docket No. 12-268:** *Expanding the Economic
and Innovation Opportunities of Spectrum
through Incentive Auctions*

Dear Mr. Spivey:

Cellular Network Partnership d/b/a Pioneer Cellular supports the Competitive Carriers Association, ("CCA"), filing on a hybrid geographic licensing design for use in the upcoming incentive auction. Pioneer Cellular supports the proposal based on the concept of utilizing Partial Economic Areas, ("PEAs"), should the Federal Communications Commission, (FCC), not utilize Cellular Market Areas, ("CMAs"), for the auction.

Pioneer Cellular's licensed service area currently covers approximately 600,000 POPs encompassing 47 counties in western and southern Oklahoma and 14 counties in southern Kansas; therefore, the use of CMAs, or alternately PEAs, for the upcoming auction would be essential for Pioneer Cellular as we continue to build out our 4G LTE expansion. The use of Economic Areas, ("EAs"), would not be economically feasible for Pioneer.

We appreciate your attention in assisting small rural carriers in our efforts to promote viable and affordable wireless services.

Should you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard Ruhl". The signature is fluid and cursive, with the first name "Richard" and last name "Ruhl" clearly distinguishable.

Richard Ruhl,
General Manager

RR/ta
pc: Mr. Nick Mikula
Pioneer Executive Management